

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:)	
TINA M. LUCAS)	CASE NO.: 2:19-bk-10943-amc
)	CHAPTER 13
DEBTOR)	JUDGE ASHLEY M. CHAN
)	
US BANK TRUST NATIONAL ASSOCIATION,)	
NOT IN ITS INDIVIDUAL CAPACITY BUT)	
SOLELY AS OWNER TRUSTEE FOR VRMTG)	
ASSET TRUST)	
)	
CREDITOR)	
)	
TINA M. LUCAS, DEBTOR, GARY K. LUCAS,)	
CO-DEBTOR AND)	
SCOTT F. WATERMAN, TRUSTEE)	
)	
RESPONDENTS)	

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust has filed a Motion for Relief from Stay and Co-Debtor Stay with the court for Relief from the Automatic Stay of Section 362 and Section 1301.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion, then on or before **September 2, 2022** you or your attorney must do all of the following:

(a) file an answer explaining your position at:

United States Bankruptcy Court
Robert N.C. Nix Building
900 Market Street, Suite 400
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to Movant's attorney:

Joshua I. Goldman, Esq.
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashley M. Chan, the United States Bankruptcy Judge, in Courtroom 1 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, PA 19107-4299 on **September 14, 2022 at 11:00 AM**, or as soon thereafter as counsel can be heard, to consider the motion.

4. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at (610) 208-5040 to find out whether the hearing has been canceled because no one filed a response.

5. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

/s/ Joshua I. Goldman
Joshua I. Goldman, Esq.
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Counsel for Creditor

August 19, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy has been furnished to the parties on the attached Service List by electronic notice and/or by First Class U.S. Mail on this the 19 day of August 2022:

Respectfully submitted,

/s/ Joshua I. Goldman

Joshua I. Goldman, Esq.

Pennsylvania Bar # 205047

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Counsel for Creditor

SERVICE LIST (CASE NO. 2:19-bk-10943-amc)

DEBTOR

TINA M. LUCAS
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CO-DEBTOR

GARY K. LUCAS
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TRUSTEE

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U.S. TRUSTEE

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